

KOLR 10

Independent Broadcasting Company
Post Office Box 1710
Springfield, Missouri 65801-1716
(417) 862-1010

Ellis Shook, Vice President
General Manager

June 3, 1996

The Hon. Susan Ness, Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20054

Dear Ms. Ness:

I am worried that FCC is considering altering its "right to reject" rules to permit networks to bind affiliates to contracts preventing so called "economic preemptions". I strongly oppose this shortsighted proposal and urge you to reject it. The proposed change would permit the networks to drastically limit the programs that an affiliate may preempt. The problem is not so much the number of hours pre-empted but the absolute control. For example, my agreement with the network provides for a certain maximum number of hours of preemption per year. However, under the proposed change when pressure is applied to affiliates, I believe their inevitable response will be to scale back dramatically on preemptions of all kinds -- even public interest preemptions like debates and public affairs. If affiliates are forced by this proposed new rule to plead a "public interest" case for every preemption, affiliates will simply be unable to choose programming most suitable for our community. The networks can and do exert unbelievable pressure.

I urge you not to break what is working. In reality, it is working. Only the networks may be complaining because they naturally would like to have absolute control. Who wouldn't? Also, this rule is really about the TV industry and local stations, not network control. I would urge the Commission not to do anything which erodes the attempt of a local station to be involved in localism and serving the local community. If there is a problem, please tell us about it so that we can address that.

I urge you not to change the rule on "right to reject".

Sincerely,



Ellis Shook
General Manager

ES:bg

bcc: Kurt Wimmer

KOLR 10

Independent Broadcasting Company
Post Office Box 1716
Springfield, Missouri 65801-1716
(417) 862-1010

Ellis Shook, Vice President
General Manager

June 3, 1996

The Hon. James H. Quello, Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, D.C. 20054

Dear Mr. Quello:

I am worried that FCC is considering altering its "right to reject" rules to permit networks to bind affiliates to contracts preventing so called "economic preemptions". I strongly oppose this shortsighted proposal and urge you to reject it. The proposed change would permit the networks to drastically limit the programs that an affiliate may preempt. The problem is not so much the number of hours pre-empted but the absolute control. For example, my agreement with the network provides for a certain maximum number of hours of preemption per year. However, under the proposed change when pressure is applied to affiliates, I believe their inevitable response will be to scale back dramatically on preemptions of all kinds -- even public interest preemptions like debates and public affairs. If affiliates are forced by this proposed new rule to plead a "public interest" case for every preemption, affiliates will simply be unable to choose programming most suitable for our community. The networks can and do exert unbelievable pressure.

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I urge you not to change the rule on "right to reject".

Sincerely,



Ellis Shook
General Manager

ES:bg

bcc: Kurt Wimmer

④ A CBS Affiliate

NEWSCHANNEL 7

WJHG • P.O. BOX 2349 • PANAMA CITY, FLORIDA 32402 • 904-234-2125 • 

JOHN L. RAY
PRESIDENT / GENERAL MANAGER

May 30, 1996

The Hon. Reed E. Hundt, Chairman
The Hon. James H. Quello, Susan Ness
and Rachelle B. Chong, Commissioners
Federal Communications Commission
1919 M Street, N.W., Eighth Floor
Washington, D.C. 20054

Re: MM Docket 95-92

Dear Chairman Hundt and Commissioners:

Over the past two years we at WJHG-TV have been very proud of our origination of on-air Telethons on behalf of the Central Panhandle Chapter of the American Red Cross. These telethons have raised nearly \$80,000 for the Red Cross and have become the local chapter's single biggest fundraising effort. The additional funding could not have been more timely since the Red Cross has had to help the Panhandle of Florida recover from massive flooding in the wake of Tropical Storm Alberto, as well as the devastation caused by Hurricane Opal.

In airing these telethons we have had to pre-empt numerous hours of network (NBC) programming, something we felt was necessary in view of the greater public service we were performing. This is just one of the instances of how we serve our local community, a service we feel will be diminished if the network-affiliate "right-to-reject" rules are modified. While we don't pre-empt our network randomly, we do program in the public interest of our viewers, as well as reviewing whether network programming is suitable for the community standards of our area.

We feel strongly that rewriting network-affiliate rules to eliminate "economic preemptions" would result in the networks challenging any decision on the local level on economic grounds. This would severely impact our ability to serve the people of Northwest Florida with the quality programming which has become the standard for this station since it went on the air.

On behalf of WJHG-TV, I urge you to retain the "right to reject" rules as they are currently written.

Sincerely,



John Ray

cc: Mr. Ralph Gabbard - President, Gray Communications Systems, Inc.
Mr. William F. Caton - Secretary, Federal Communications Commission

KWTX BROADCASTING COMPANY

6700 American Plaza, Waco, TX 76712 • P.O. Box 2636, Waco, TX 76702-2636
Phone 817/776-1330 • FAX 817/751-1088

THOMAS G. PEARS
President

June 3, 1996

The Hon. Reed E. Hundt, Chairman
The Hon. James H. Quello, Susan Ness
and Rachelle B. Chong, Commissioners
Federal Communications Commission
1919 M Street, N.W., Eighth Floor
Washington, DC 20054

Re: Review of the Commission's Regulations Governing Programming
Practices of Broadcast Television Networks and Affiliates
MM Docket 95-92

Dear Chairman Hundt and Commissioners:

I am the President of two CBS affiliated stations -- one in Waco, Texas and one in Bryan, Texas. We have been network affiliates for over forty years and we wholeheartedly endorse the network-affiliate relationship as it now exists. However, it is our understanding that the FCC is in the process of possibly altering its rules so that the broadcast networks could bind their affiliates to contracts preventing so-called "economic" preemptions. Please do not make this change in the rules.

As local broadcasters, we must be free to program our stations and not be at the mercy of the network. We must have the option of deciding whether we will carry Dallas Cowboy pre-season football games, or Big 12 Football, or Billy Graham Crusades, or telethons.

Please retain the current rules that will continue to allow us to have autonomy from the networks. Thank you for your consideration.

Sincerely,

KWTX BROADCASTING COMPANY
BRAZOS BROADCASTING COMPANY



Thomas G. Pears
President

TGP/jm

KWTX AM/FM/TV
Waco, Texas

KBTX TV - Brazos Broadcasting Co.
Bryan, Texas



Johnson City - Kingsport - Bristol

Jack D. Dampecy
Vice President
and General Manager

June 03, 1996

BY FACSIMILE

The Hon. Reed E. Hundt, Chairman
The Hon. James H. Quello, Susan Ness
and Rachelle B. Chong, Commissioners
Federal Communications Commission
1919 M Street, N.W., Eighth Floor
Washington, D.C. 20054

Re: *Review of the Commission's Regulations Governing Programming
Practices of Broadcast Television Networks and Affiliates
MM Docket 95-92*

Dear Chairman Hundt and Commissioners:

I am writing to you to voice my opposition to any amendment to our current "right to reject" clause in our network affiliation agreement. To empower networks with the ability to block any preemption it deems economic in nature would have dire effects on our station and our viewership.

Here is an example: East Tennessee State University, to my knowledge, has never benefitted from athletic exposure on any of the major networks. However, the ETSU Bucs are very popular with the folks here in East Tennessee and Southwest Virginia. Our viewers strongly associate themselves with the Buccaneer athletic programs. They are not a national powerhouse and even though they were nationally ranked in 1990 and 1991, they did not have one game aired on a major network. WJHL-TV on the other hand, has preempted network programming anywhere from two to six times every year for the last ten years to carry East Tennessee State University games. By preempting the network on those occasions, we achieved the following:

1. Pleased tens of thousands of sports fans by allowing them to view their favorite local team on away games.
2. Aided the university's athletic department in raising revenue due to televising the games by way of sponsorships and rights fees.
3. Aided the university's recruiting efforts by enabling them to promise televised games to players considering East Tennessee State.
4. Increased revenue for the station versus what we would have received from our regular network programming.

338 E. Main Street, P.O. Box 1130 • Johnson City, TN 37605-1130
Phone (423) 926-2151 • Fax (423) 434-4537

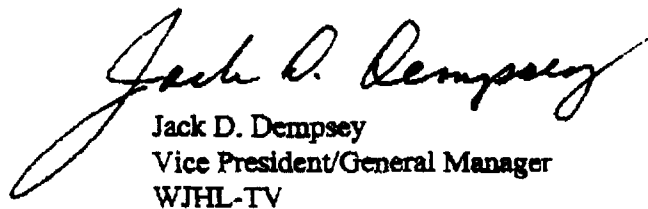
Roy H. Park Broadcasting of the Tri-Cities, Inc.

Page 2

I believe we can offer better entertainment, on occasion, than the network offers. In our recent negotiations with the network, we agreed to limit our preemptions to that of previous years which is roughly fifteen hours per year, averaged over the years. This is not a great deal of time, but it does represent a significant part of our revenues.

Again, please do not limit our ability to preempt network programming in any way.

Respectfully submitted,



Jack D. Dempsey
Vice President/General Manager
WJHL-TV

JDD/pb

cc: Docket File



Charleston / Huntington

June 3, 1996

A CBS Affiliate ●

The Honorable Susan Ness, Commissioner
Federal Communications Commission
1919 M Street, N.W., Eighth Floor
Washington, D.C. 20054

Dear Commissioner Ness:

I urge you to leave in place the "right-to-reject" rule relating to television station affiliates of networks. Amending that rule to eliminate "economic" preemptions could damage the economic health of network affiliated stations.

Affiliated stations, particularly in smaller markets, need to be able to preempt network programming for many reasons. We, as affiliates, replace network programs from time to time for public affairs event coverage, telethons that benefit wonderful causes, sporting events of great interest to local and regional viewers, and for programming that sometimes brings much needed revenues to broadcasters.

There is a delicate balance of power that exists in stations' dealings with networks. With the "right-to-reject" rule, the "little guy (station)" can avoid being pushed around by the bigger force (the network). Without it, stations would lose equilibrium and, in some cases, money.

Sometimes, "economic" preemptions are needed to help a local television station remain viable. However, even if the concept of eliminating "economic" preemptions was universally valid, I cannot imagine any set of rules that could be crafted to objectively determine which preemptions are "economic" and which are "non-economic." For example, many public affairs programs are sponsored. Does that make them "economic?" If they are "economic," does that make them any less worthy?

I urge you not to amend the "right-to-reject" rule. It continues to serve the public well.

Sincerely,

Garry H. Ritchie
Vice President & General Manager

GHR/jlr

c: Kurt Wimmer

Covington & Burling

555 Fifth Avenue, P. O. Box 13, Huntington, West Virginia 25706-0013 • Tel. (304) 525-1313 • Fax (304) 529-4910

A Service of Gateway Communications, Inc.



Charleston / Huntington

A CBS Affiliate

June 3, 1996

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W., Eighth Floor
Washington, D.C. 20054

Dear Chairman Hundt:

I urge you to leave in place the "right-to-reject" rule relating to television station affiliates of networks. Amending that rule to eliminate "economic" presumptions could damage the economic health of network affiliated stations.

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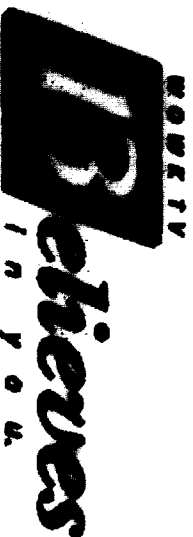
A handwritten signature in dark ink, appearing to read "Gerry M. Ritchie", is written over the word "Sincerely,".

Gerry M. Ritchie
Vice President & General Manager

GHR/jlr

c: Kurt Wimmer
Covington & Burling

555 Fifth Avenue, P. O. Box 13, Huntington, West Virginia 25706-0013 • Tel. (304) 525-1313 • Fax (304) 529-4910



Charleston / Huntington
June 3, 1996

A CBS Affiliate

The Honorable James H. Quello, Commissioner
Federal Communications Commission
1919 M Street, N.W., Eighth Floor
Washington, D.C. 20054

Dear Commissioner Quello:

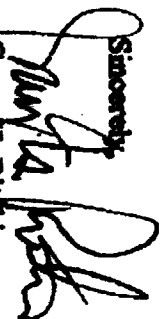
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I urge you not to amend the "right-to-reject" rule. It continues to serve the public well.

Sincerely,

Garry H. Ritchie
Vice President & General Manager

GHR/jlr

c: Kurt Wimmer

Covington & Burdick
555 Fifth Avenue, P.O. Box 13, Haddonfield, New Virginia 25706-0013 • Tel. (304) 525-1313 • Fax (304) 529-4910

A Service of Gateway Communications, Inc.



Charleston / Huntington

A CBS Affiliates

June 3, 1996

The Honorable Rachele B. Choeg, Commissioner
Federal Communications Commission
1919 M Street, N.W., Eighth Floor
Washington, D.C. 20054

Dear Commissioner Chong:

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I urge you not to amend the "right-to-reject" rule. It continues to serve the public well.

Sincerely,

A handwritten signature in dark ink, appearing to read "Garry H. Hestie".

Garry H. Hestie
Vice President & General Manager

GHR/jlr

c: Kurt Wimmer

Covington & Burdick
555 Fifth Avenue, P.O. Box 13, Manhattan, West Virginia 25706-0013 • Tel. (304) 525-1313 • Fax (304) 529-0910

A Service of Quesway Communications, Inc.

BRIAN JONES
Vice President/General Manager



June 3, 1996

The Honorable Rachelle B. Chong, Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20054

VIA MAIL AND FAX

Dear Commissioner Chong:

As you consider the upcoming "Right To Reject" rule as it applies to the relationship between a broadcast network and its affiliates, please understand the importance of local television and our relationship to our home markets.

The occasional necessity of local pre-emptions is a right that we reserve with our networks from the inception of our affiliation agreements. These pre-emptions are used judiciously and are used for a variety of local news, sports and religious programming.

Networks can in many ways view all pre-emptions as "economic". The basic facts are that we pre-empt a fraction of a percentage of the network's programming.

The bottom line is that localism in broadcasting is the backbone of what we do. The network is a partner and provides quality programming to our viewers here.

We respectfully ask that when you consider the "Right To Reject" rule next week, that you leave it as it is and allow us to make the same responsible programming decisions, right here at home, that have made us what we are.

Best regards,

A handwritten signature in black ink, appearing to be 'BJ', written over the printed name and title.

Brian Jones
Vice President/General Manager

BJ/ck

bcc: Kurt Wimmer
Covington & Burling

DALLAS
2777 STEMMONS FWY SUITE 1189
DALLAS, TEXAS 75207
TELEPHONE 214-631-1111
FACSIMILE 214-631-1110

FORT WORTH
5233 BRIDGE STREET
FORT WORTH, TX 76103
TELEPHONE 817-451-1111
FACSIMILE 817-446-4145

A GAYLORD ENTERTAINMENT COMPANY

BRIAN JONES
Vice President/General Manager



June 3, 1996

The Honorable Susan Ness, Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20054

VIA MAIL AND FAX

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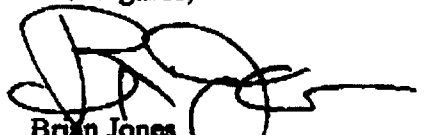
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Covington & Burling

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FACSIMILE 817-446-4145

A GAYLORD ENTERTAINMENT COMPANY

BRIAN JONES
Vice President/General Manager



June 3, 1996

The Honorable James H. Quello, Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, D.C. 20054

VIA MAIL AND FAX

Dear Commissioner Quello:

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Best regards,

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Brian Jones
Vice President/General Manager

BJ/ck

bcc: Kurt Wimmer
Covington & Burling

DALLAS
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A GAYLORD ENTERTAINMENT COMPANY

BRIAN JONES
Vice President/General Manager



June 3, 1996

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20054

VIA MAIL AND FAX

Dear Chairman Hundt:

As you consider the upcoming "Right To Reject" rule as it applies to the relationship between a broadcast network and its affiliates, please understand the importance of local television and our relationship to our home markets.

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Brian Jones
Vice President/General Manager

BJ/ck

bcc: Kurt Wimmer
Covington & Burling

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FORT WORTH
5233 BRIDGE STREET
FORT WORTH, TX 76109
TELEPHONE 817-451-1111
FACSIMILE 817-446-4145

A GAYLORD ENTERTAINMENT COMPANY



United Way
of Southwest Georgia

302 Tift Ave.
P.O. Box 7
Albany, Georgia 31702-0007
(912) 999-6700
FAX: (912) 436-6378

May 31, 1996

The Hon. Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W., Room 816
Washington D.C. 20034

Re: Review of the Commission's Regulations Governing Programming
Practices of Broadcast Television Networks and Affiliates.
MM Docket 95-92.

Dear Chairman Hundt:

I am writing to ask that you retain the current network affiliate
rules and not change the regulations referenced above.

The United Way of Southwest Georgia operates in a small city in an
economically-depressed area of our state. We attempt to raise
 sorely-needed funds for a variety of human service agencies at the
lowest possible overhead cost. We cannot provide this service
efficiently if we have to pay for advertising to get our message
out. While we do not engage in telethons, we are heavily dependen
upon free public service announcements. We realize that this free
air time is made possible in part by the revenues made available t
our local stations by economic preemptions of their respective
networks.

Again, on behalf of the approximately 30,000 local citizens who
benefit from the services provided by our 33 member agencies, we
strongly ask that you retain the network affiliate rules now in
place.

Sincerely,

Wayne McHenry,
President and Chief
Professional Officer

cc: Docket File

The Power To Outgrow

May 31, 1996

WM Docket 95-82



The Honorable Raul E. Mendez, Chairman
Federal Communications Commission
1919 M Street, N.W. Room 814
Washington, D.C. 20554

Dear Mr. Mendez:

As a private non-profit charitable organization that serves a 31 county rural region of Georgia we are extremely interested in the current issue before the Commission regarding a change of network affiliate rules. We do not support a change in the regulations for the following reasons:

Local affiliates have the ability under the current regulations to preempt network programming. This is essential for organizations such as our that depend heavily on local viewing of our national Television along with time for our local segments.

Additionally, some network shows are not in keeping with the regions social values and culture. The local station MUST retain the ability to preempt programming that is unsuitable.

As private non profits we asked to ensure more and more of the social welfare programs currently operated by government it is critical that local network affiliates remain strong. Funding reductions proposed for social programs are drastic and local funds must be obtained. Our current partnership with our local network affiliate provides essential support through public service announcements, talk shows and Television to like 20+ programs managed by Easter Seal. Over 1500 children and adults with disabilities and their families benefit as a result.

Please retain the network affiliate rules now in place and allow our partners to operate in the responsive, high quality fashion that has become a tradition in Albany and Southwest Georgia.

Thank you for your consideration.

Sincerely,

Raul E. Mendez

Beth English
Executive Director

Southwest Georgia Easter Seal Society, Inc.

1906 Palmyra Road
Albany, Georgia 31701-1598
(912) 438-7061 • Fax (912) 435-6278



DOUGHERTY COUNTY SCHOOL SYSTEM
P.O. BOX 1470/400 S. MONROE STREET
ALBANY, GEORGIA 31702-1470

DR. JOHN W. CULBREATH
SUPERINTENDENT

KATHRYN B. WHEELER
EXTENDED DAY PROGRAM COORDINATOR
(912) 431-1280

June 3, 1996

The Hon. Reed E. Hundt, Chairman
The Hon. James H. Quello, Susan Nease
and Rachelle B. Chong, Commissioners
Federal Communications Commission
1919 M Street, N.W., Eighth Floor
Washington, D.C. 20054

Re: Review of the Commission's Regulations Governing Programming
Practices of Broadcast Television Networks and Affiliates
MM Docket 95-92

Dear Chairman Hundt and Commissioners:

WALB TV is a small local TV station that does a great deal of public service telecasting.

As one of the recipients of their generosity, I strongly urge you to retain the network affiliate rules now in place, so that this service to the community can continue.

Sincerely,

Kathryn B. Wheeler
Coordinator

KBW/flb

pc: Jim Wilcox



PHONE 502-442-8214
BUSINESS FAX 502-442-2096
NEWS FAX 502-443-4021

May 29, 1996

The Honorable Reed E. Hundt, Chairman
The Honorable James H. Quello, Susan Ness
and Rachelle B. Chong, Commissioners
Federal Communications Commission
1919 M Street, N.W., Eighth Floor
Washington, D.C. 20054

Dear Chairman Hundt and Commissioners:

Broadcasters, especially those of us who are still owned by families whose lives have been tied to a particular community for generations, may be the prime source of community service among businesses in the United States. Not only do we provide countless hours of free time for public service, we also provide live local news and weather information, including severe storm warnings. If the networks have their way in revising affiliation rules, our ability to serve "in the public interest" and with a local focus will be adversely affected.

If the power to reject network programs because of content or what we consider greater local public need is eliminated, it is the public that will suffer most.

In the past, we have rejected programs, both network and syndicated, because of content which we believed to be unacceptable to the majority of our viewers, or because we believed serving the local community with another program was better. That choice has been a part of many program contracts in the past, and we believe it should remain.

We also believe interpretation of what is truly an "economic" reason for preemption of the network cannot be made objectively by any network.

For example, we have carried a live one-hour church service from Paducah's largest church for many years. They have their own television facilities and the live element is vital to them. It has aired at 11 a.m. on Sundays at a moderate fee paid by the church. Meanwhile, network sports has increasingly encroached into the pre-noon hours over the past several years, already causing preemptions of 12-15 weeks of programming by the church during major playoffs or events which have large audiences.

NBC recently decided to begin its pre-game football show at 11 a.m. on Sundays, and asked all stations to carry it. We declined, except for special occasions mentioned above. We made that decision because there are many older or incapacitated people who rely on that church service because they can't go to the church. On the other hand, the network might interpret our decision as economic even though we may generate equal or better revenue with network sports in that time period.

We also wonder about the fate of our 40-year tradition and 13-million dollars raised on the purely local Lions Club Telethon of Stars. It preempts *Saturday Night Live*, *Nightside*, *Sunday Today*, *Meet the Press* and occasionally part of a football game.

Would this also preclude occasional paid preemptions for call-in programs concerning heart disease, cancer, mental health and other important issues, sponsored by area hospitals? Certainly, the preemption could be termed "economic" because the hospitals do pay for the time, and are businesses. Who decides if this type of programming is indeed a local service which outweighs a network entertainment show and its value to the network?

Would this also mean that our network can force us to move two teen shows back to Saturday morning instead of being delayed to Sunday morning in order to air an hour of local news on Saturday morning? No other station has a mid-morning newscast on Saturday in this market. Is that an "economic" decision because the station makes money selling advertising on the news, or is news a public service which overshadows two teen programs on the network?

We are concerned that the concentration of power in the communications industry, which continues in almost geometric progression may now begin to affect the network-affiliate relationship. That relationship, we believe, has been balanced in a way which serves both the network and the local stations/viewers better than any other communications entity.

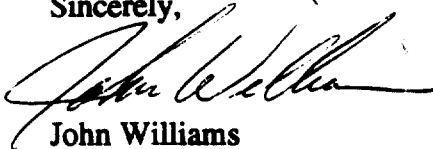
Just as the government operates on a system of checks and balances, we believe local stations provide a similar service to viewers.

We are proud of our network, and we do carry nearly all of the programs they offer. And, we certainly enjoy the fruits of the very successful network efforts of recent years in increased revenue.

However, we genuinely care for the viewers in our viewing area. We believe no one knows better how to serve their interests than a local station which has listened to their opinions through thousands of phone calls and letters or through live call-ins during our news. We try to balance that with providing a good living for the families of some 100 employees.

We ask that you consider these delicate balances when you make your decision about the network-affiliate contract rules.

Sincerely,



John Williams
Vice-President and
General Manager

mh

cc: William F. Caton, Secretary (2 copies)
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554
Re: MM Docket 95-92

DRAPER COMMUNICATIONS, INC.

1729 N. SALISBURY BLVD.
POST OFFICE BOX 2057
SALISBURY, MD 21802
410/749-1111
FAX 410-749-6098

May 24, 1996

The Honorable Reed E. Hundt, Chairman
The Honorable James H. Quello, Commissioner
The Honorable Susan Ness, Commissioner
The Honorable Rachelle B. Chong, Commissioner
Federal Communications Commission
1919 M Street, N.W., Eighth Floor
Washington, DC 20054

Dear Commissioners:

It has come to my attention that the Commission is debating whether or not to alter several rules affecting the Network/Affiliate relationship.

As a small broadcaster - WBOC-TV, Salisbury, MD (#163) and KGBT-TV, Harlingen, Texas (#107); I believe that our ability to reject network programming is essential to maintain balance in the relationship.

In my view I see localism as the fundamental core value for a broadcaster. Along that view I see more local programming on the horizon. At times that programming may require preemptions which a Network doesn't like. If we as local broadcasters are pressured by the Networks with greater abilities than they already have; I don't think that would be good for the viewers, or the relationship.

Thus, I would hope that the Network/Affiliate rules could be left in tact on this issue.

Thank you for your consideration.

Sincerely,

DRAPER COMMUNICATIONS, INC.



Thomas H. Draper, President

dce

4201 Texoma Parkway • Sherman, TX 75090 • 903-892-8123 • FAX 903-893-7858

K X I I -TV

Richard D. Adams
Vice President & GM

June 3, 1996

Hon. Rachelle Chong, Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20054

Re: Net-Affiliate Right to
Reject Rule

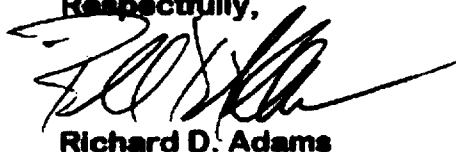
Dear Commissioner Chong:

I am proud to report to you that I am able to administer and program this television station in a manner that is reflective of the attitudes, mores and yes, values of a region of our country known as Texoma. This television station's position in the communities it serves as well as the ratings it generates would seem to validate the notion we are giving viewers in North Texas and Southern Oklahoma much of what they want and approve of.

When viewers complain, we listen intently; when enough viewers complain, we act because we don't believe we are smart enough to get it right all the time. My message is, we respond in the true sense of localism and in the spirit of what was intended nearly 50 years ago when t.v. frequencies were allocated to cities in the country.

The foregoing is lost forever if the right to reject rule is eroded or eradicated. Moreover, television stations whose duty is to serve the (local) public interest are hamstrung from rejecting network programs or commercials it deems objectionable. Please, leave the right to reject rule, right where it is—in tact! Texoma's dominant television station doesn't need to be programmed from New York or Los Angeles.

Respectfully,



Richard D. Adams



4201 Texoma Parkway • Sherman, TX 75090 • 903-892-8123 • FAX 903-893-7858

KXI-TV

Richard D. Adams
Vice President & GM

June 3, 1996

Hon. Reed E. Hundt, Chmn.
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20054

Re: Net-Affiliate Right to
Reject Rule


Dear Chairman Hundt:

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K X I I -TV

Richard D. Adams
Vice President & GM

June 3, 1996

Hon. James Quello, Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, D.C. 20054

Re: Net-Affiliate Right to
Reject Rule

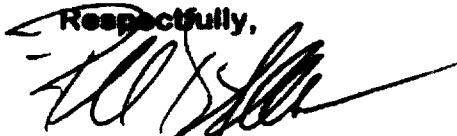
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Richard D. Adams
Vice President & GM

June 3, 1996

Hon. Susan Ness, Commissioner
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20054

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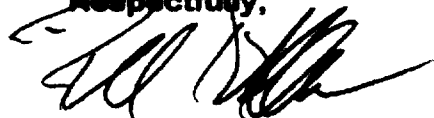
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Respectfully,



Richard D. Adams





May 28, 1996

P.O. Box 3130 • Albany, Georgia 31708-3130 • 912-883-0154 • Fax 912-434-8768

The Hon. Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, N. W., Room 814
Washington, DC 20054

**Re: Review of the Commission's Regulations Governing
Programming Practices of Broadcast Television
Networks and Affiliates.
MM Docket 95-82.**

Dear Chairman Hundt:

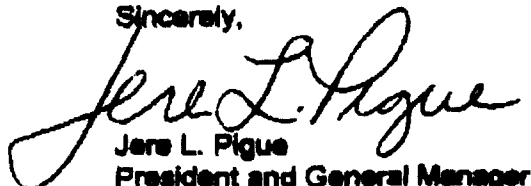
I am writing to ask that you retain the network affiliate rules and NOT change the above Regulations. WALB-TV is a small market station. We work hard to provide LOCAL service to our entire viewing area. Economic preemptions of the network contribute greatly to our ability to provide the more than one half million dollars annually in public service to our communities.

Our right to preempt also upholds a quality check on network programming that helps us stay consistent with LOCAL values and tastes. If we cannot preempt unacceptable network programming for programming more suitable to our local market we will be severely disadvantaged compared to cable and other programmers.

The right to reject rule protects our local autonomy. Our local control will be lost if every preemption becomes subject to a public interest inquisition by the network. Our small voices in the network-affiliate relationship will all but disappear and the balance of power will shift inescapably to the network if it is given this amount of control over internal affairs of our small station.

On behalf of the seventy six employees of this small market station and the large number of local public service agencies and organizations we try to assist, we strongly ask that you retain the network affiliate rules now in place.

Sincerely,


Jere L. Pigue
President and General Manager

cc: Docket File



A DIVISION OF COM. COMMUNICATIONS